

- 48-1 Although the text of Appendix F in the draft RMP/EIS states the vegetation of the Sand Butte WSA includes "Large stands of native grasses in good condition..." these areas do not qualify as good ecological condition using the methodology described in Appendix D, page D-10. Areas in the Sand Butte and Raven's Eye WSAs that support significant amounts of native grasses also support high proportions of cheatgrass and other exotic species such as goatsbeard and China lettuce. Two rabbitbrush species are also present and they add very little to the ecological condition rating. These areas are grouped into the same broad vegetation types as occur on surrounding areas on Map 11. However, on Map 10, Ecological and Seeded Condition, portions of the Sand Butte and Raven's Eye WSAs are shown in fair ecological condition.
- 48-2 A discussion on threatened and endangered plant species is located on page 3-12 of the draft RMP/EIS. Headings have been added and the most recent publication of the Rare and Endangered Plants Technical Committee was cited for the final EIS. Also see the response to comment 15-6.
- 48-3 The analysis and rationale for the wilderness suitability recommendations will be more detailed in the final Wilderness EIS for the Monument Planning Area.
- 48-4 See response to comment 21-2.
- 48-5 We believe the population goals for big game are realistic. Given the continual loss of brush to the wildfire-cheatgrass problem, it will be difficult to maintain population levels, let alone increase them.
- The winter ranges shown on Map 15 for RMP development are defined by known winter distribution since data were collected. These boundaries are approximate. Data from winter 1983-1984 and 1984-1985 will be incorporated before the RMPs are drafted. We will work closely with IDFG on habitat improvements.
- Methodology for wildlife is described on page C-8. Threshold "triggers" were set by professional judgment. See response to comment 21-2.
- Rehabilitation of winter ranges will be a high priority in the RMP area for both pronghorn and mule deer. Brush plantings and fire breaks will be specific objectives.

The rationale about non-designation of the area for ACEC status has been expanded in the proposed Monument RMP on page 53.

- 48-11 The proposals for developing water sources in Laidlaw Park are proposed to decrease costs for hauling water that presently support grazing in the north end of the park. They would not increase grazing in the good condition areas. The brush control in Laidlaw Park would benefit sage grouse and big game (see response to comment 45-1). Seeding would be done only in areas with an understory predominance of cheatgrass. A mixture of perennial grasses and forbs would be superior to cheatgrass for nearly all wildlife species.
- 48-12 See response to comment 45-8.

- 48-6 We believe Swainson's hawks are currently limited in the planning area by a shortage of nest sites. We will provide artificial nest structures and plant trees for natural nest sites. We expect some of these sites to be occupied by Swainson's hawks but cannot predict how many. Competition will exist for sites between Swainson's and red-tailed hawks, ravens, and perhaps other species. The number of structures we can provide is determined by funding, which has been very limited for wildlife resources.

Swainson's hawks prefer agricultural land for hunting once crops have been removed because of the high prey base. Development of agriculture has probably benefited this species where nest sites are available and human disturbance is limited.

- 48-7 The Wood River sculpin is not known to occur in waters adjacent to public land in the planning area. If it is observed in the future, management actions will be taken to protect or enhance its habitat.

- 48-8 Riparian habitat is assessed on page 3-8 of the draft RMP/EIS. Basically, there isn't much more to say. Riparian habitat is scarce in the planning area and most of it is already adequately protected. The condition of riparian habitat along the Little Wood River varies between fair and excellent, and all fenced areas are steadily improving. The only major fishery in the planning area, also in the Little Wood River, is already good to excellent and is improving with riparian habitat.

Riparian habitat along Vineyard Creek is also in excellent condition and is protected by the natural inaccessibility of the creek area. This area is proposed as an ACEC to help protect the riparian zone and the unique fishery.

There are numerous plays in the planning area. One has willows and does not require further protection. The others are without woody vegetation and probably would not support it under any conditions because of late summer loss of water.

There are no known threatened and endangered or candidate plant species in any of the riparian areas.

- 48-9 While an ACEC designation does not specifically remove the possibility that a tract could be reconsidered in future planning for transfer from public ownership, it would tend to make such an action unlikely. We would not recommend an area for special management priority if we thought it would someday be transferred.

- 48-10 No formal rare plant inventories have been conducted on this site. However, range conservationists have inspected the area and discovered no rare or uncommon plants.

Letter Number 49
August 9, 1984

Monument RMP

Charles Haszler, Manager
Shoshone District BLM
P. O. Box 2
Shoshone, Idaho 83352

Dear Mr. Haszler;

Your proposed Monument Resource Management Plan places too much emphasis on livestock and not enough on habitat, wildlife, and recreation. You should instead adopt Alternative D, which would reduce grazing by 33% and would reduce soil erosion rates, improve the vegetation and habitat for wildlife, and improve recreational opportunities.

Overgrazing has already damaged the soil and vegetation in the Monument RMA. It needs less livestock, not more.

1. Range improvement funds should be used to replace and create winter range for deer and antelope; range that has been destroyed by grazing, and by cheatgrass.
2. You should not build any more water pipelines, especially not into the areas of remaining good vegetation. Those areas should not be loaded up with more livestock, but should be retained for wildlife. The water pipelines are an expensive subsidy to the cattle graziers, and usually damage wildlife habitat.
3. Any brush removal should be done for the benefit of wildlife, if necessary, and not for cattle.
4. Allowing 10% decrease in antelope and deer populations on winter and summer ranges is outrageous. You should try to improve the ranges to allow a return toward pre-grazing levels for those species.
5. Soil erosion rates should be reduced; a goal would be pre-grazing levels.
6. Preserving natural diversity is paramount. Please recommend wilderness designation for the following WSAs: Bear Den Butte, Raven's Eye, Sand Butte, Little Deer, Shoshone, and Chale Butte.
7. I support your proposals for the following ACECs: Box Canyon-Bluehart Springs, Substation Tract, Vineyard Creek, and Silver Sage Playa.

- 49-1 8. The final EIS should include B/C analyses, and they should show grazing analyses separate from the analyses for non-commodity resources.
9. Don't sell any of this public land. It is most valuable retained (and improved) for wildlife habitat.

Sincerely,
Jerry Jayne
Jerry Jayne
1568 Lola St.
Idaho Falls, Id. 83402

Response to Letter Number 49

IDAHO STATE HISTORICAL SOCIETY
610 NORTH JULIA DAVIS DRIVE BOISE, 83702



August 9, 1984

49-1 See response to comment 45-8.

Mr. Charles J. Hassler
District Manager
Bureau of Land Management
Shoshone District
P.O. Box 28
Shoshone, Idaho 83352

Dear Mr. Hassler:

Thank you for forwarding a copy of the draft Monument Resource Management Plan/Environmental Impact Statement to our office for review and comment.

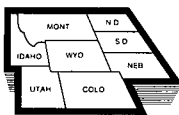
Our comments regarding references to cultural resources are limited at this time. However, we will be looking forward to receiving the cultural resource management plans referred to in the RMP/EIS so that we may review and comment on them in more detail.

Sincerely,

Tom Green
Thomas J. Green
State Archaeologist
State Historic Preservation Office

TJG/bhd

Letter Number 51



**Rocky Mountain
Oil & Gas Association, Inc.**

345 PETROLEUM BUILDING • DENVER, COLORADO 80202
303/534-8261

August 9, 1984

Mr. Ervin Cowley
Project Manager
Bureau of Land Management
P. O. Box 28
Shoshone, ID 83352

Dear Mr. Cowley:

I am writing on behalf of the Rocky Mountain Oil and Gas Association (RMOGA) regarding the Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) for the Monument and Bennett Hills planning area, Shoshone District, Idaho. RMOGA is a trade association whose hundreds of members account for more than 90% of the oil and gas exploration and production activity in the eight-state region it serves.

We support the Production Alternative, Alternative B. According to the Draft RMP/EIS, the Preferred Alternative, Alternative C, would leave open for leasing all of the highest potential areas for oil, gas and geothermal resources, as determined by the BLM. However, we would like to make the following comments for your consideration.

51-1 We feel the RMP/EIS fails to thoroughly address the issue of energy resource potential, other than to rate it low within existing Wilderness Study Areas (WSA's). It is important to note, however, that there has been little or no exploration activity in these areas, and that a low rating cannot be assumed merely because exploration data is not available.

-1-

August 9, 1984
Mr. Ervin Cowley
Project Manager - BLM

page two

An area's subsurface resources are potentially as important as an area's surface resources. We believe that an area's mineral resources should be explored prior to making decisions regarding management of the land, especially wilderness recommendations. We believe areas of high geologic favorability should remain open to exploration and development, but unless some exploration is allowed to take place, the geologic favorability of an area may never be known. We encourage the BLM to leave open these unknown geologic areas to exploration so that needed data can be accumulated in order to make sound wilderness decisions.

Another factor which should be taken into consideration in determining what type of land management is best for these areas, is that a wilderness designation is not the only way an area's surface resources can be protected from harm. Existing statutes, including the National Environmental Policy Act, Federal Land Policy and Management Act, National Forest Management Act, Clean Air Act, Endangered Species Act, and National Historic Preservation Act, provide superlative protection for all our nation's environmental resources.

In addition, the oil and gas industry has proven that our operations are entirely compatible with sensitive environmental values. Operational techniques minimize the area and amount of disturbance; and rehabilitation capabilities have reached such a level of competence that the impacts of oil and gas operations are virtually, if not entirely, unnoticeable, and in all cases only temporary.

We note that all of the alternatives would restrict oil, gas and geothermal exploration if the recommended acreage were designated as wilderness, and surface occupancy would be restricted in areas of geologic interest and Areas of Critical Environmental Concern (ACECs). Because of the availability of lease and operating stipulations and restrictions, we do not believe lands must be placed in such restrictive classifications to protect specific resources.


Lastly, areas of moderate to high potential for deposits of oil, gas or geothermal resources should remain open to exploration and production with a minimum of restrictions. The BLM should develop land use allocations which will be compatible with possible exploration for and development of these resources.

August 9, 1984
Mr. Ervin Cowley
Project Manager - BLM

page three

We encourage your consideration of these comments prior to completion of the final RMP/EIS. Thank you for the opportunity to express our views.

Sincerely,


Alice I. Frell
Public Lands Director

AIF:cm

Response to Letter Number 51

51-1 The BLM has no way of establishing energy mineral potential for areas being considered in the planning process other than through the geologic literature and well data or geophysical data generally available to the public. Input from private industry on mineral potential of areas of interest would allow the mineral specialist to demonstrate a level of potential based on real evidence.

TABLE 5-1
LIST OF PREPARERS

Name Present Position	RMP/EIS Responsibility	Education	Experience
Michael Boltz Range Conservationist	Livestock Forage and Rangeland Management	B.S. Wildlife Biology M.S. Forest and Range Mgmt. Washington State University	3 years Research Biologist-WSU, 1 year Wildlife Biologist-SCS, 4 years Range Conservationist-BLM
Harold Brown District Realty Specialist	Lands and Realty	B.S. General and Physical Science, Adams State College; 2 years Civil Engineering, International Correspondence School; 1 year Cadastral Surveying, various schools	5 years Cadastral Surveying/Land Surveying; 1 1/2 years Land Law Examiner, 3 years Cartographer, 8 1/2 years Realty Specialist-BLM
Joseph E. Carter Range Conservationist	Fire Ecology/Vegetation/Livestock Grazing	B.S. Range Resources, University of Idaho	4 years Range Conservationist-BLM
Robert C. Cordell Bennett Hills Area Manager	Management Direction	B.S. Range Management, University of Arizona	5 years Range Conservationist, 4 years Realty Specialist, 4 years Area Manager-BLM
Ervin R. Cowley Monument Area Manager	Project Manager/ Management Direction	B.S. Range Management, Utah State University	5 years Range Conservationist, 4 years Watershed Specialist, 2 years Planning/Environmental Coordinator, 8 years Area Manager-BLM
Lawrence L. Dee Geologist	Minerals and Energy	B.S. Geology Florida State University	15 years Oceanographer; 3 years Geologist-BLM
Stan Frazier Economist	Economics	B.S. Agricultural Economics, Oregon State University	8 years Economist-BLM
William T. Harris Soil Scientist	Soils and Watershed	B.S. Soil and Water Science, University of California- Davis	3 years Soil Scientist-SCS; 2 years Soil Scientist-State of Idaho; 2 years Soil Scientist, 4 years Soil Scientist/Watershed Specialist-BLM
Robert B. Hellie Wilderness/Recreation Specialist	Wilderness	B.S. Political Science, B.S. Outdoor Recreation, Utah State University	4 years Peace Corps Park Management, Philippines and Honduras; 7 years Recreation Specialist-BLM
John E. Husband Planning & Environmental Coordinator	Team Leader	B.S. Forestry, Purdue University	5 years Forester, 1 1/2 years Planner BLM
Jon Idso Assistant District Manager for Resources	Editing/Coordination	B.S. Recreation, University of Iowa M.A. Recreation, New Mexico University	2 years Recreation Planner-Federal Power Commission; 4 1/2 years Envi- ronmental Coordinator/EIS Review/ EIS Team Leader, 1 1/2 years Outdoor Recreation Planner, 1 1/2 years Planning Coordinator, 1 1/2 years Assistant District Manager-BLM
Richard Kodeski Outdoor Recreation Planner	Recreation/Visual Resources	A.A.S. Forestry, Paul Smith's College B.S. Outdoor Recreation, University of Wyoming	2 years Forestry Technician-USFS; 3 years Recreation Technician-USFS/BIA 1 year Park Ranger-Utah Parks and Recreation; 3 years Outdoor Recrea- tion Planner-BLM
John C. Lytle Archaeologist	Cultural Resources	B.A. and M.A. Anthropology, University of Wyoming	2 years Coal EIS Team, 2 years Compliance Archaeologist, 4 years District Archaeologist-BLM
Carlos Mendiola Fire Management Officer	Fire Management	3 years College	13 years Fire Management, 7 years Fire Management Officer-BLM
Clarence Ouellette Visual Information Specialist	Thematic Maps	High School Diploma	23 years Imagery Interpretation Specialist-USAF; 7 years Visual Information Specialist-BLM
Derinda D. Rapp Editorial Assistant	Typist/Editor	1 1/2 years College	5 1/2 years Grazing Clerk, 1/2 year Resource Data Assistant, 1/2 year Range Technician, 1/2 year Mail and File Clerk, 3 years Editorial Clerk and Assistant-BLM
Terrell Rich Wildlife Biologist	Wildlife	B.S. Wildlife Ecology, University of Wisconsin, M.S. Zoology, Idaho State University	2 years Environmental Quality Specialist-State of Idaho; 4 years Wildlife Biologist-BLM